

1 than themselves, and obtained identity documents bearing the defendants' photograph in the
2 victims' names and personal identifiers, many of the documents in the discovery necessarily
3 include personal identifiers. Redacting the personal identifiers of participants, witnesses, and
4 victims would prevent the timely disclosure of discovery to defendant.

5 3. The United States agrees to provide Protected Documents without redacting the
6 personal identifiers of participants, witnesses, and victims.

7 4. Access to Protected Documents will be restricted to persons authorized by the
8 Court, namely defendants, attorneys of record and attorneys' paralegals, investigators, experts,
9 and secretaries employed by the attorneys of record and performing on behalf of defendant.

10 5. The following restrictions will be placed on defendant, defendants' attorneys and
11 the above-designated individuals unless and until further ordered by the Court. Defendants,
12 defendants' attorneys and the above-designated individuals shall not:

13 a. make copies for, or allow copies of any kind to be made by any other
14 person of Protected Documents;

15 b. allow any other person to read Protected Documents; and

16 c. use Protected Documents for any other purpose other than preparing to
17 defend against the charges in the Indictment or any further superseding indictment arising out of
18 this case.

19 6. Defendants' attorneys shall inform any person to whom disclosure may be made
20 pursuant to this order of the existence and terms of this Court's order.


21 7. The requested restrictions shall not restrict the use or introduction as evidence of
22 discovery documents containing personal identifying information such as social security
23 numbers, drivers' license numbers, dates of birth, and addresses during the trial of this matter.

1 8. Upon conclusion of this action, defendants' attorneys shall return to government
2 counsel or destroy and certify to government counsel the destruction of all discovery documents
3 containing personal identifying information such as social security numbers, drivers' license
4 numbers, dates of birth, and addresses within a reasonable time, not to exceed thirty days after
5 the last appeal is final.

6 DANIEL G. BOGDEN
7 United States Attorney

8 /s/
9 CRANE M. POMERANTZ
Assistant United States Attorney

March 11, 2016
DATE

10 
11 MICHAEL SANFT, ESQ.
Counsel for defendant Hamey

March 11, 2016
DATE

12
13 ORDER

14 IT IS SO ORDERED.

15 
16 United States Magistrate Judge

17 DATED: March 14, 2016
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